III. FUTURE METHOD OF OPERATION (FMO) for SBC (All Regions)

A. Overview

The evaluation of the PMO across the thirteen states has given SBC the opportunity to identify where process changes can be made to enhance the business processes in each of the SBC regions. CLEC input and SBC's experience in the rapidly changing data business has provided insight in how to enhance the xDSL pre-ordering and ordering processes. This FMO is based on the introduction of 13-state common business practices, even though not required by this specific merger condition. SBC provides access to the same pre-order data via its Verigate, EDI Pre-Order and DataGate interfaces. Verigate and EDI Pre-Order functions use DataGate to access backend systems. SBC's EDI Ordering and LEX interfaces both access LASR to process the same types of Local Service Requests using the same business rules structure. SBC is committed to maintain Verigate and Pre-Order EDI in sync with DataGate and LEX in sync with the EDI Ordering interface. Further, once deployed as discussed in Section C, SBC will maintain the Ameritech TCNet GUI for Loop Qualification, in sync with Ameritech's EDI Pre-Order interface.

B. Loop Pre-Qualification

The existing loop pre-qualification process will remain available in the SWBT and PB/NB regions. Currently the RTZ indicator is available via Verigate and DataGate as a part of the Pre-Qualification function for PB/NB. With the July 22, 2000 release, Verigate and DataGate will be enhanced to replace the RTZ indicator with the Equivalent Loop Length field and add Red, Yellow and Green status to the Pre-Qualification function. This will make the PB, NB and SWB capabilities the same. This function in SWBT region has been enhanced as of March 18, 2000 to provide two additional fields of data, the Wire Center Code and Design Cable Gauge Make-up. These same two fields will be provided in PB/NB by July 22, 2000. Additionally, the pre-order loop pre-qualification function has been made available in the SNET region as of March 27, 2000. It will also be made available in the Ameritech region at such time as the loop pre-qualification functionality is available to any company in that region, including but not limited to Ameritech or AADS or March 2001, whichever is earlier. There will be no charge for Loop Pre-Qualification. The performance of the Pre-Qualification step by the CLEC is optional.

C. Loop Qualification

SBC will furnish CLECs with access to a mechanized loop qualification capability that can be used to qualify loops on a pre-order basis. This function will be available as part of EDI and DataGate pre-order functionality. This mechanized loop qualification will provide the CLEC's with the information needed to make an informed business decision regarding its ability to provide DSL-based service to the end user.

The loop qualification/loop make up response for the SWB/PB/NB release on March 18, 2000 and the Ameritech release on April 3, 2000 will return the following information to the CLEC for a loop to the specified end user premises:

- Loop length: includes both the feeder pair (F1) and the distribution pair to the customer's terminal (e.g., Pedestal) (F2). By July 22, 2000, for "Project Pronto" Broadband UNE Loops, the loop length will be returned indicating the length of the portion that is copper and the length of the fiber from the Central Office to the RT. The overall loop length for all loops will display the portion that is copper and the portion that is fiber, either in this field or in separate fields, no later than May 17, 2000.
- Loop length by segment
- Length by gauge
- 26 gauge equivalent loop length (calculated)
- Presence of load coils
- Quantity of load coils (if applicable)
- Presence of bridged taps
- Length of bridged taps (if applicable)
- Presence of pair gain/DLC
- Qualification status of the loop based on specified PSD. If no PSD class is specified, the default PSD is class 5 (ADSL).
- Source of data – actual or designed

A data source indicator will identify if the response contains information about an actual loop or information regarding the longest designed loop within the distribution area. Designed loop information will only be provided when actual loop make-up information is not mechanically available for the specific requested address.

The following information will be returned, when available, in response to a Loop Qualification request. Due to the differences in OSS used in the different SBC regions, and past engineering practices followed when installing and managing loop plant, the amount of loop make-up information available in SBC's OSS will vary. Where such information is not available, the CLECs desire that an indication be made as to whether the data is not available distinguished from the situation where the value is zero. SBC will pass a "Null" value through its DataGate, EDI and CORBA interfaces, when information is not available. Providing the "Null" indicator will eliminate programming problems for both SBC and the CLECs[1].

- Location of load coils
- Presence of repeaters

[1] In standard programming practice, a NULL value is used for a blank field. The NULL value appears in machine language as a HEX Code 00 with a length of zero. Most programs are coded to look for this NULL value and if present move on to the next data item without taking any other action. To return a value of asterisk or some other value in blank fields will complicate programming structures. In addition, the use of blank as a Null value is in accordance with the accepted National Standards for EDI and CORBA.

- Location of repeaters
- Type of repeaters
- Quantity of repeaters
- Type of plant (aerial or buried)
- Type of loop (copper or fiber)
- Availability of spare facilities
- Location of bridged tap
- Quantity of bridged tap by occurrence
- Location of bridged tap by occurrence
- Quantity of range extenders
- Location of range extenders
- Location of pair gain devices
- Type of DLC
- Location of DLC
- Quantity of DLC
- Presence of DAML
- Presence of disturbers in same or adjacent binder groups
- Loop medium
- Whether the loop originates at a Remote Switching Unit (RSU)
- Location of Remote Switching Unit (RSU)
- Type of Remote Switching Unit (RSU)
- Resistance zone
- Whether the loop originates at an ADSL Capable Remote Terminal (RT)
- Whether the loop originates at a Non-ADSL Capable Remote Terminal (RT)
- Indicator of whether ADSL capable RT is available
- Target date of when ADSL capable RT will be deployed
- Location of ADSL capable RT by address
- Location of ADSL capable RT by CLLI
- Location of non-ADSL capable RT by address
- Location of non-ADSL capable RT by CLLI
- Wire Center Code

- Taper Code

For designed loop qualification and manual request results responses, SBC will provide by July 22, 2000 both the build date and the date the record was last accessed. However, when loop make-up information is composed of actual data, SBC cannot provide similar date information.

By April 24, 2000, SBC will make available sample data for 100 addresses in each SBC/Ameritech States so CLECs may review the types of data that will be returned.

To ensure CLECs that SBC's EDI and DataGate pre-order functions have access to and return all information related to loop make-up that is contained in SBC's systems and databases, SBC will allow CLECs to review/audit SBC's systems and processes to establish the fact that SBC has made all data fully available. The process for such a review and audit will be determined by May 1, 2000 and will include parameters for materials necessary for the review/audit, frequency and scope of the review/audit, selection of representatives of the CLECs' choice, as well as format and distribution of the review/audit results.

SBC is committed to populating existing databases in all operating regions on a going forward basis as individual manual requests for loop qualification information are received and performed by SBC engineers within 4 business days of completion of the manual look up. Further, SBC will launch an effort to populate loop make-up data in mechanized systems where it does not exist so that the percent of actual data becomes consistent with the level of actual data in the Ameritech region. This project will begin in July 2000 but, because of the massive amount of data to be converted, could take 4-6 years to complete. SBC will solicit feedback from CLECs on the priority of offices for which data will be populated and make every attempt to mechanize the data for those offices based on the CLEC priorities identified. SBC will report on a quarterly basis, via Accessible Letter, offices completed in the previous quarter and offices scheduled for the next quarter.

SBC will enhance Ameritech's TCNet GUI application by September 1, 2000 to include all Loop Qualification (LQ) functionality that will be made available via Ameritech's EDI interface for LQ on April 3, 2000. The LQ functionality being proposed for TCNet will be comparable to what SWBT/PB/NB will be providing on April 29, 2000.

SBC commits that access to data through EDI and DataGate pre-ordering functionality will include all data fields related to loop make-up information that resides in SBC's systems. Further, SBC commits that as its manual records are mechanized, these EDI and DataGate pre-order functionalities will also be updated to access the new electronic records.

In summary, the pre-ordering capabilities for xDSL will return all loop qualification information that is available electronically when requested via the DataGate or EDI electronic interfaces.

D. Ordering

All of SBC's regions currently use LSRs either sent mechanically through EDI or faxed to the Local Service Center for xDSL/Line Sharing Capable loop orders. The LSR, which is the industry standard ordering form for local services, will continue to be the ordering mechanism for xDSL/Line Sharing Capable loops. However, five fields on the LSR are either used differently or may have different values on a regional basis. SBC will standardize the use of these five LSR fields specific to the ordering of xDSL-capable loops throughout its regions.

When a CLEC decides to request an xDSL-capable loop, the CLEC will submit an LSR to SBC via EDI. The LSR must include the requested PSD class and any desired conditioning. The CLEC can specify the desired due date based upon set intervals for a non-conditioned or conditioned loop. The CLEC can also pre-authorize known and unanticipated conditioning charges.

Currently, there are some differences pertaining to the types and technical specifications of xDSL/Line Sharing Capable loops offered. Rather than having standards based on technology, which are by their very nature limiting, the industry is currently moving toward spectrum management classes that are not based on specific technologies. SBC's regions will standardize its xDSL/Line Sharing Capable loop product offerings based on the industry's proposed broad-spectrum management classes. Currently, PSD 5 is the only offering provided for Line Sharing. As the industry develops additional PSDs that are proven to function with the voice portion of a Line Shared loop, those PSDs will be open to Line Sharing.

With the adoption of consistent xDSL/Line Sharing Capable loop products, both CLECs and SBC will benefit from consistency and flexibility in the rapidly emerging data market. CLECs will be able to designate the spectrum class they are requesting through use of the NC, NCI and SECNCI code fields on the LSR. Values utilized in these LSR fields will be standardized across the 13 states.

SBC will enhance its Verigate, DataGate and EDI interfaces to add a new, optional field in which a CLEC may place a Reference Number with a Loop Qualification (LQ) request by the planned July 22, 2000 release. This field can be used with the Actual/Detail and Manual LQ Inquiries as an optional field. It will be provided back on the Actual/Detail/Manual Request and Manual Results LQ Responses. This field will be returned on responses for the CLEC to use in tracking the inquiry. The Reference Number Field will be a 16-character alpha/numeric field. Address will continue to be the means to search for Loop Qualification results. SBC will consider additional capabilities within the Change Management Process. CLECs will be allowed to utilize the CNO field of the LSR as an optional field for their own reference number. In no circumstance shall the lack of a reference number in the CNO field affect the timely flow through processing of a Local Service Request. There will be no edits on this field.

By utilizing the pre-order loop qualification capability, a CLEC will have information about the amount and type of conditioning that may be required to support its technology prior to issuing its loop request. A CLEC will utilize the Service or Product Enhancement Code (SPEC) field on the LSR to request the level of line conditioning it seeks. Occasionally, the assignment and provisioning process will identify additional conditioning that will positively impact the loop's performance. SBC will make it possible for a CLEC to pre-authorize this unanticipated

conditioning. This will be accomplished by means of the SPEC value entered on the LSR. SBC will standardize the use of the SPEC field across all regions. This will eliminate interruptions to the provisioning process while waiting for authorization of additional conditioning. CLECs have expressed support for this option. Further SBC commits to assess the development of a SPEC code, which would allow CLECs to preauthorize necessary conditioning. This would be in the form of a xDSL/Line Sharing Capable loop product enhancement and a decision will be made not later than May 1st, 2000.

The CLEC will not incur a charge for the removal of low pass filters on SBC's side of the demarcation point.

For xDSL/Line Sharing Capable unbundled loops with a length of 12,000 feet or less, SBC will remove load coils, repeaters, and excessive bridged tap, if present on the assigned loop, without requiring the CLEC to specify that conditioning is desired. The conditioning will be performed at no additional charge in accordance with the language contained in the merger conditions paragraph 21 at p. 31 which says "...unbundled loops of less than 12,000 feet (based upon theoretical loop length) that could be conditioned to meet the minimum requirements defined in the associated SBC/Ameritech technical publication through the removal of load coils, bridged tap, and/or voice grade repeaters will be conditioned at no charge to the requesting Advnaced Services Provider...".

CLECs expressed the desire to have definite due date intervals. CLECs also want to be certain when they get a FOC, the due date is firm and not subject to change. SBC will implement standard intervals throughout all regions for conditioned and non-conditioned loops. Standardized due dates will enhance the CLECs' ability to negotiate firm due dates with their end users. The typical interval for performing a manual loop qualification should be 3-5 business days[2]. The due date interval, for a xDSL/Line Sharing Capable loop of 12,000 feet or less requiring conditioning, will be no longer than ten business days. The normal interval for installation of 1 to 20 loops of less than 12,000 feet where no conditioning is required is 5 business days, and no longer than 10 business days where conditioning is required. Thus, the normal overall maximum interval for the processing of an error free order should be no longer than 15 business days. The previous description of intervals is for illustration purposes only.

SBC's electronic ordering systems will validate the LSR including verifying that the loop is capable of supporting the requested PSD class. After all the order information has been validated, SBC will issue a service order and return a FOC to the CLEC.

After the SBC service order has been issued and the loop has been assigned, SBC will then provide loop make up information for the actual assigned loop to the CLEC via a DLR or DLR-like document. In regions where an industry standard DLR is unavailable, SBC will provide a DLR like response containing all information in an industry standard DLR for loops used to provide Advanced Services. This industry standard DLR or DLR-like response will be continuously updated as inside/outside plant information is modified through the life of the circuit as information on the DLR or DLR-like response might be changed.

[2] In Texas the arbitrated manual loop qualification interval is 3 business days.

E. Ordering Flow Through

SBC is committed to creating ordering flow through as a matter of routine. While it is not always feasible to develop ordering flow through for every ordering scenario, SBC strives for continuous improvement in flow through rates. A matrix of planned ordering flow through for xDSL/Line Sharing Capable loops is contained in Attachment B.

F. Documentation

Documentation to support the CLECs' understanding and utilization of the enhancements to the EDI and DataGate discussed in this Plan of Record will be in the format currently utilized in each SBC region. However, a subteam of the 13 state Change Management Process drafting team is currently reviewing interface documentation from all SBC regions and will propose a common format that meets CLEC needs. When this format is finalized, all documentation in support of enhancements identified in this Plan of Record not already drafted will be released in the new format.

G. Timeline

Because xDSL technology deployment choices are so dependent on loop make up information. CLECs have stated they need this information to correctly provision and maintain service to end users. SBC recognizes the importance of delivering this information to CLECs including access to a pre-order loop qualification function that will deliver information while their service representatives are negotiating service with their customers. This will promote faster turnaround times between initiation of a service request, and the receipt of qualification advice, loop information and order confirmation. SBC intends to furnish CLECs with the capability to perform xDSL loop qualification (or detailed loop make up) in an enhancement to its DataGate (where currently deployed) and EDI pre-ordering interfaces.

In order to deliver this capability to the CLEC community in an expedited fashion, SBC will initially provide access to loop qualification information based on a designed model. This will first eliminate the manual step described in the PMOs and then the process will be enhanced to access actual loop data. This mechanized access to loop qualification information (based on the designed model) will initially be available, in the PB/NB and SWBT regions, via DataGate. The DataGate enhancement to support loop qualification was implemented March 18, 2000.

This same capability will also be made available via EDI. The EDI enhancement is planned for April 29, 2000. This EDI functionality will be made available in the existing EDI pre-ordering interfaces in the SWBT and PB/NB regions. Comparable changes will also be made in the SNET EDI interface. These changes will be introduced in SNET via the July 22, 2000 release even though the SBC/Ameritech Merger Conditions allow for the SNET changes to be implemented on a later timeline.

Use of loop information based on a designed model is not being utilized in Ameritech. The EDI pre-ordering interface within the Ameritech region will be enhanced to provide loop qualification

based on actual loop data without making the interim change described for the other regions. This interface enhancement will be made available in the Ameritech region on April 3, 2000 per specifications provided via TCNet on January 27, 2000. The additional loop make-up data elements identified in the Plan will be added to this interface by May 17, 2000. The ability to use actual loop data, where available, via both DataGate (where currently deployed) and EDI interfaces, is planned for April 29, 2000 in the SWBT and PB/NB regions and for July 22, 2000 in the SNET region.

Although the actual changes to the EDI ordering interfaces are not complex, these changes will take time to introduce within SBC in order to be ready to allow CLECs to benefit from the improved ordering process. Therefore the EDI ordering changes will be introduced in the Ameritech, PB/NB and SWBT regions no later than December 2, 2000. These same process changes will be made in SNET within the obligatory timeframe. However the exact date has yet to be determined. The Uniform Interfaces Plan of Record will identify the release date when these process changes will take effect in SNET.

Please refer to the following timeline for more detail.

Enhanced OSS Plan of Record for Pre-Ordering and Ordering of xDSL and Other Advanced Services – March 31, 2000

SBC FMO Timeline -- Release Schedule

Milestones	Availability Date
Loop Qualification	
Access to the loop qualification information based on a designed model	
DataGate (SWBT/PB/NB)	
• Initial Specifications Accessible Letter	12/17/1999
• Final Specifications Accessible Letter	1/14/2000
• CLEC Testing Start Date	2/9/2000
• Implementation	3/18/2000
Loop Qualification	
Access to actual loop qualification information where mechanized data is available. Loop qualification information based on a designed model will be supplied where actual loop qualification information is not available	
EDI (Ameritech)	
• Pre-Notification of Change	12/16/1999
• Final Specifications available via TCNET	1/27/2000
• Implementation	4/3/2000
DataGate (SWBT/PB/NB)	
• Implementation (UNE Remand)	4/29/2000
EDI (SWBT/PB/NB)	
• Implementation (UNE Remand)	4/29/2000
EDI (Ameritech)	
• Implementation (UNE Remand)	5/17/2000
EDI (SNET)	
• Implementation (UNE Remand)	7/22/2000
Ordering	
EDI (SWB/PB/NB)	
• CLEC Testing Start Date	4/24/2000
• Implementation	5/27/2000
EDI (Ameritech – Line Sharing only)	
• CLEC Testing Start Date	4/24/2000
• Implementation	5/27/2000
EDI (SNET – Line Sharing)	
• Implementation	5/27/2000
EDI (Ameritech – xDSL Ordering Flow Through)	
• Implementation	12/2/2000

OSS Plan of Record for Pre-Ordering and Ordering of xDSL and Other Advanced Services Glossary of Terms

Local Service Request (LSR)
The industry standard format developed under the auspices of Ordering and Billing Forum (OBF) for the ordering of local service Resale, Number Portability, individual Unbundled Network Element (UNE) Loops and Ports and UNE Loops and Ports in combination.

Local Service Request Exchange (LEX)
An SBC proprietary graphic user interface (GUI) utilized for the mechanized exchange of ordering information based on LSR industry guidelines.

Pacific Bell / Nevada Bell (PB/NB)
The two-state operating region of SBC, which encompasses the states of California and Nevada.

Power-Spectrum Density (PSD) Classes
Broad classes of spectrum attributes that correspond to different types of DSL technology. Rather than defining parameters for each current DSL technology, plus all future offerings, PSD classes speak to speed of data transmission and whether data is transmitted in a synchronous or asynchronous manner. One PSD Class may support many types of DSL technology.

SBC Communications (SBC)
The corporate entity which encompasses SWBT, PB/NB, Ameritech and SNET.

Southern New England Telephone (SNET)
The SBC operating region, which includes the state of Connecticut.

Southwestern Bell Telephone (SWBT)
The five-state operating region of SBC, which encompasses the states of Missouri, Oklahoma, Kansas, Arkansas and Texas.

Verigate
An SBC proprietary graphic user interface (GUI) utilized for the mechanized exchange of pre-ordering information.

DSL FLOW THROUGH AVAILABILITY BY DSL TYPE AND LOCATION

DSL TYPE	REQTYP	ACT TYPE	SWB	PB	AIT	SNET
xDSL < 12,000 ft.	A	N	X	X	X	
		D	X	X	X	
		V		X		
	B	V	X	X	X	
xDSL up to 17,500 ft.	A	N	X	5-27-00		
		D	X	5-27-00		
	B	V	X	5-27-00		
Spectrum Management – PSD Masks 1-5, 7 Note: Dependent upon where available (Non-DLE HFPL and DSL Loops)	A	N	5-27-00	6-27-00	Plan 12-2-00	Plan 12-2-00
		D	5-27-00	5-27-00	Plan 12-2-00	Plan 12-2-00
		C* *w/LNA N or D	5-27-00	5-27-00	Plan 12-2-00	Plan 12-2-00
	B	V	5-27-00	5-27-00	N/A	
Broadband UNE DLE – Line Sharing (DLE HFPSL) *(Project Pronto)*	A	N	5-27-00	5-27-00	Plan 12-2-00	Plan 12-2-00
		D	5-27-00	5-27-00	Plan 12-2-00	Plan 12-2-00
		C* *w/LNA N or D	5-27-00	5-27-00	Plan 12-2-00	Plan 12-2-00
DLE – ADSL – Data only – Sub Loop	A	N	5-27-00	5-27-00	Plan 12-2-00	Plan 12-2-00
		D	5-27-00	5-27-00	Plan 12-2-00	Plan 12-2-00
		C* *w/LNA N or D	5-27-00	5-27-00	Plan 12-2-00	Plan 12-2-00
	B	V	5-27-00	5-27-00	N/A	

REQTYP A = Loop Service
REQTYP B = Loop with Number Portability
LNA = Line Activity
X = Flow Through in place

Updated: March 31, 2000

Advanced Services OSS Plan of Record
Issues in Dispute

In compliance with paragraph 15(c), following is a list of disputed issues related to SBC Plan of Record on Advanced Services (POR). Although SBC believes most of the issues are clearly outside of the scope of the merger conditions, this list contains all disputed issues addressed in the collaborative discussion. Issues clearly outside of the scope should be resolved in a more appropriate setting, as noted below. For each issue. SBC has briefly identified its position and has also attempted to summarize the CLEC's position, based upon statements CLEC representatives have made during the collaborative discussions. SBC understand that the CLECs will be filing their own list of disputed issues and reserves the right to respond to such issues after it has had an opportunity to review that filing

The FCC limited scope of Merger Conditions 15(c) to EDI/Datagate pre-ordering and ordering systems for DSL and other Advanced services. SBC reserves the rights to argue that any disputed issues identified in this filing, or by the CLECs in their filing(s), are outside of the scope of the Merger Conditions, depending upon how the issues are ultimately framed.

ISSUE 1: Whether the Plan of Record requires SBC to make available real-time mechanized access to all loop make up data contained in SBC's internal records. databases, and back-end systems to comply with the Merger Conditions?

> **SBC Position**: SBC's enhancements to Datagate and EDI Pre-Ordering fully comply with the Merger Conditions and the UNE Remand rules by providing nondiscriminatory mechanized access to all loop make up data available to SBC personnel.
>
> **CLEC Position**: CLECs appear to dispute whether SBC is making available all loop make up. Separate and apart from that issue, CLECs appear to seek direct access to any and all systems that an SBC incumbent LEC engineer would access to provide information for mechanized databases and to respond to loop qualification requests.

ISSUE 2: Whether the POR properly addresses Real-time Flow-Through of CLEC Orders as required by the Merger Conditions 15(c)?

> **SBC Position:** SBC's activities to improve mechanized flow through, which are prioritized in accordance with anticipated demand, are in full compliance with the Merger Conditions. ADSL was the first DSL offering for which industry standards were developed and thus SBC made it a high priority to implement mechanized ordering and provisioning systems for ADSL. The POR contains detailed flow-through programming plans for more recent xDSL offerings.

CLEC Position: Although ADSL was one of the earliest DSL offerings. SBC's flow-through plans have historically favored ADSL over other types of xDSL. Further, the current flow-though plans do not contain sufficient detail.

ISSUE 3: Whether the interval within which data derived from manual look-ups, performed at the request of CLECs, will be populated in electronic databases is adequate?

SBC Position: The four-day interval offered by SBC is reasonable as it reflects the maximum actual time necessary to perform 100% of all manual look-ups. While some information may be updated more quickly, all information will not be updated in the time frame requested by the CLECs. Further conversion of manual records to the OSS database is outside the scope of the merger conditions. Nevertheless, SBC agreed to convert the data after each manual look-up. The remaining dispute is over the time period in which this update will occur. Though not required to do so by the merger conditions, SBC will update these systems in a shorter time frame where systems are fully automated.

CLEC Position: SBC should commit to updating its systems within four hours following the completion of a manual look-up of loop make up information. The CLECs want to ensure that they are not charged for a manual look-up once a manual look-up has been performed for another CLEC.

ISSUE 4: Has SBC provided parity between CLECs and SBC's advanced services affiliates in access to OSSs?

SBC Position: Yes, SBC's provides nondiscriminatory access to its OSSs for all CLECs, including ASI and AADS. Although each CLEC, including SBC affiliates, may have its own proprietary OSS's, the manner in which CLECs and the data affiliates access SBC's OSS is the same. SBC presented diagrams and matrices along with explanations during the collaborative process to demonstrate parity in access. SBC answered all questions. It is improper for CLECs to use the POR process to seek information about their new competitors ASI and AADS. The merger conditions provide for a number of mechanisms to address parity, including extensive annual audits of the merger conditions in general, detailed agreed-upon audit procedures for the advanced services affiliates and performance measures. No additional procedures or discovery is appropriate.

CLEC Position: CLECs argue that ASI's proprietary interfaces should be available to other CLECs.

ISSUE 5: Does the POR provide sufficient information to address all OSS issues related to line sharing?

SBC Position: SBC's POR is in full compliance with the Merger conditions in that is details releases scheduled for ordering and provisioning activity for the new Line Sharing elements. Further, the Plan provides detailed requirements for

those enhancements. Finally, the Company conducted conference meeting/conference calls to walk through those requirements with CLECs

CLEC Position: More detail is needed to evaluate the Plan of Record's completeness regarding Line Sharing.

ISSUE 6: Whether SBC is in compliance with Merger Condition 15(c) by seeking to charge for loop qualification when a CLEC initiates an order for a DSL loop without expressly seeking loop qualification.

SBC Position: Because the POR addresses all issues with regard to pre-qualification and qualification of DSL loops, it is in full compliance with the Merger Conditions. As noted by Mr. Strickling in his Febuary 24, 2000 letter, pricing issues are outside of the scope of this POR. Rather, this is an issue more appropriately left to state regulatory bodies, which have, in many cases are already addressing this and other DSL pricing issues.

Although pricing issues are not a proper subject for this POR, SBC asserts that a per service order loop qualification charge is necessary to recover costs incurred to provision DSL and other advanced services loops. SBC is open to alternative price mechanisms and has offered to discuss this further with the CLECs. Although SBC has offered to consolidate the pre-qualification and loop qualification steps in some circumstances to shorten the time frames for provisioning, SBC must still recover the costs in performing the qualification step in order to determine if loop conditioning is required.

CLEC Position: There should be no charge for a loop qualification on orders for loops less than 12,000 feet.

ISSUE 7: Whether the Merger Conditions require OSS ordering for UNE-P in connection with line sharing?

SBC Position: The Merger Conditions clearly do not require SBC to provide OSS ordering systems for UNE-P in connection with line sharing. By the clear language of the Line Sharing Order, SBC is required to unbundled the high frequency portion of the loop (HFPL) only when SBC is the voice provider. In a UNE-P scenario, SBC is not the voice provider. It is improper for CLECs to seek a rehearing of the Line Sharing order in this proceeding.

CLEC Position: The CLECs feel processes for a UNE-P provider to offer and participate in line Sharing should be included in the Plan of Record. The Plan is silent on this subject.

ISSUE 8: Whether the Merger Conditions require SBC to provide conditioning on loops less than 18,000 feet without charge?

SBC Position: The Merger Conditions do not require SBC to address pricing issues in this Plan of Record. The CLECs request goes well beyond the merger conditions and State arbitration awards. The appropriate avenue for CLECs to address this issue is before State Commissions where these pricing issues have in many cases already been addressed.

CLEC Position: SBC should not charge for conditioning loops up to 18,000 feet in length, instead of the 12,000 foot limit now in place.

ISSUE 9: Do the Merger Conditions require SBC to provide copies of Methods and Procedures Documents for EDI/Datagate beyond the requirements documents made available through Change Management Process for all system enhancements?

SBC Position: SBC is in full compliance with the Merger Conditions which do not require the Company to provide internal proprietary documents to CLEC competitors in order to assure them of parity in OSS access. Rather, SBC provides CLEC with requirements documents in connection with Change Management. SBC's Methods and Procedures, which detail the duties of SBC employees, are not necessary for CLECs to properly use SBC's OSSs. Similar information is provided to CLECs in OSS requirements documents. SBC has offered to provide copies of documentation previously submitted to the CLEC in support of upcoming OSS releases. Further, SBC solicited input from the CLECs for enhancements to that documentation. The Enhanced Plan of Record demonstrates that SBC is committed to providing detailed information necessary for to CLECs to properly use the Pre-Ordering and Ordering Interfaces and to understand the enhancements put forward in its Plan of Record.

CLEC Position: The CLECs requested copies of SBC internal Methods and Procedures to audit SBC internal procedures beyond what is necessary for the CLEC to use the pre-ordering and ordering interfaces.

ISSUE 10: Whether the Merger Conditions Require SBC to provide the CLECs with documentation of the dismantling of the Spectrum Management system.

SBC Position: The Merger Conditions do not require SBC to provide documentation of its dismantling of the spectrum management process. The FCC's Advanced Services Order required SBC to dismantle its Spectrum Management process and SBC has complied with that order. SBC has dismantled the Spectrum management system. The POR does not reference spectrum management because it no longer exists. If SBC has failed to dismantle spectrum

management systems, it would be in violation of FCC orders and subject to sanction by the FCC under other rules. The CLECs have no right to act as an additional regulator and seek independent verification of SBC's compliance with that order, particularly in absence of any evidence that SBC has failed to comply.

CLEC Position: SBC should provide the CLECs with any documentation that SBC may have which shows that the Company has dismantled the BGM/SFS process.